

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY
R.J. Hughes Justice Complex
P.O. Box 112
Trenton, New Jersey 08625
Attorney for Defendants Attorney General of New Jersey and Superintendent of New Jersey State Police

By: Daniel M. Vannella (015922007)
Assistant Attorney General
(609) 376-2776
Daniel.Vannella@law.njoag.gov

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CHRISTIAN BENTON, COALITION
OF NEW JERSEY FIREARM
OWNERS, GUN OWNERS OF
AMERICA, INC., and GUN OWNERS
FOUNDATION,

Plaintiffs,

v.

MATTHEW PLATKIN, in his official
capacity as the Attorney General of New
Jersey, and CHIEF PHIL OLIVO, in his
official capacity as the Police Chief of
Pennsauken Township,

Defendants.

Hon. Karen M. Williams, U.S.D.J.
Hon. Matthew J. Skahill, U.S.M.J.

DOCKET NO. 1:24-cv-07098

Civil Action

**NOTICE OF MOTION TO
CONSOLIDATE PURSUANT TO
FED. R. CIV. P. 42(a)**

Oral Argument Requested

MATTHEW STRUCK, DANIEL
FRANCISCO, and FIREARMS
POLICY COALITION, INC.,

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his
official capacity as Attorney General of
New Jersey, and PATRICK J.
CALLAHAN, in his official capacity as
Superintendent of the New Jersey State
Police,

Defendants.

Hon. Michael A. Shipp, U.S.D.J.
Hon. Justin T. Quinn, U.S.M.J.

DOCKET NO. 3:24-cv-09479

Civil Action

To:

United States District Court for the District of New Jersey
Mitchell H. Cohen Building & United States Courthouse
4th & Cooper Streets
Camden, New Jersey 08101

Steven Jay Harfenist
Harfenist Kraut & Perlstein, LLP
3000 Marcus Avenue
Suite 2E1
Lake Success, New York 11042

*Attorney for Plaintiffs Christian Benton, Coalition of New Jersey Firearm
Owners, Gun Owners of America, Inc., and Gun Owners Foundation*

Stephen D. Stamboulieh
Stamboulieh Law, PLLC

P.O. Box 428

Olive Branch, Mississippi 38654

Attorney for Plaintiffs Christian Benton, Coalition of New Jersey Firearm Owners, Gun Owners of America, Inc., and Gun Owners Foundation (pro hac vice)

Michael Joseph Miles

Arlette Leyba

Brown & Connery, LLP

360 Haddon Avenue

Westmont, New Jersey 08108

Attorney for Defendant Chief Phil Olivo, in his official capacity as the Police Chief of Pennsauken Township

Bradley Lehman

Gellert Seitz Busenkell & Brown, LLC

1201 North Orange Street, Suite 300

Wilmington, Delaware 19801

Attorney for Plaintiffs Matthew Struck, Daniel Francisco, and Firearms Policy Coalition, Inc.

Raymond M. DiGuiseppe

The DiGuiseppe Law Firm, P.C.

116 North Howe Street, Suite A

Southport, North Carolina 28461

Attorney for Plaintiffs Matthew Struck, Daniel Francisco, and Firearms Policy Coalition, Inc. (pro hac vice)

PLEASE TAKE NOTICE that, on **December 2, 2024**, or as soon thereafter as counsel may be heard, the undersigned counsel for Defendant, Matthew J. Platkin, Attorney General of New Jersey, will move before the Honorable Karen M. Williams, U.S.D.J., for an Order consolidating the two above-captioned actions pursuant to Fed. R. Civ. P. 42(a) and L. Civ. R. 42.1;

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the attached brief in support of this motion;

PLEASE TAKE FURTHER NOTICE that, pursuant to Fed. R. Civ. P. 78, oral argument is requested if there is opposition to this motion; and

PLEASE TAKE FURTHER NOTICE that a Proposed Form of Order is enclosed herewith.

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Daniel M. Vannella
Daniel M. Vannella
Assistant Attorney General

DATED: November 4, 2024